

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 2/18/2014, 2/20/2014	Man Days: 6
Inspection Unit: PAWNEE	
Location of Audit:	
Exit Meeting Contact: John Bozarth	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Kevin Hecker, Donald Hankins, Valerie Schwing	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
John Bozarth	Managing Supervisor	

Gas System Operations	Status
Gas Transporter	Ameren Illinois
Annual Report (Form 7100.1-1) reviewed for the year:	Satisfactory
Unaccounted for Gas	.53%
Number of Services	825576
Miles of Main	16888
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Not Checked
<u>General Comment:</u> <i>MAOP documentation is reviewed at each Ameren Operation Center. No MAOP records were reviewed during this audit.</i>	
Operating Pressure (Feeder)	Not Checked

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<u>General Comment:</u>		
<i>These records are located at each operations center.</i>		
Operating Pressure (Town)	Not Checked	
<u>General Comment:</u>		
<i>These records are located at each operations center.</i>		
Operating Pressure (Other)	Not Checked	
<u>General Comment:</u>		
<i>These records are located at each operations center.</i>		
MAOP (Feeder)	Not Checked	
<u>General Comment:</u>		
<i>These records are located at each operations center.</i>		
MAOP (Town)	Not Checked	
<u>General Comment:</u>		
<i>These records are located at each operations center.</i>		
MAOP (Other)	Not Checked	
<u>General Comment:</u>		
<i>These records are located at each operations center.</i>		
Does the operator have any transmission pipelines?	Yes	
<u>General Comment:</u>		
<i>Ameren has 1250 miles of transmission pipeline.</i>		
Regulatory Reporting Records		Status
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
<u>General Comment:</u>		
<i>There were 2 incidents reported. One in Mattoon, one in Duquoin. In both instances, it was determined that the explosions were not the fault of the operator.</i>		
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u>		
<i>No F7100.1 was filed after investigations determined that the explosions were not the fault of the operator.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Applicable
<u>General Comment:</u>		

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<i>No supplemental incident reports were filed after investigations determined that the explosions were not the fault of the operator.</i>		
Did the operator have any plastic pipe failures in the past calendar year?	No	
<u>General Comment:</u> <i>There were no plastic pipe failures within Ameren's gas system in 2013.</i>		
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?	Not Applicable	
<u>General Comment:</u> <i>There were no plastic pipe failures within Ameren's gas system in 2013.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<u>General Comment:</u> <i>Ameren had no safety related conditions in 2013.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<u>General Comment:</u> <i>Ameren had no safety related conditions in 2013.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Satisfactory
<u>General Comment:</u> <i>Ameren Illinois sends all new customers notification of responsibility at the time the customer signs up for service.</i>		
DRUG TESTING		Status
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>A review of Ameren's drug and alcohol plan was completed in 2011 and not part of this audit.</i>		
TEST REQUIREMENTS		Status
<u>Category Comment:</u> <i>Pressure test records are housed at the local Operation Centers.</i>		
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Not Checked
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Not Checked

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[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Not Checked
UPRATING		Status
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Checked
General Comment: <i>All uprating records for transmission are housed in the Decatur office.</i>		
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Checked
General Comment: <i>For any uprating under 30% of SMYS: Ameren keeps all records for pipeline above 60 psig in Decatur. All records for pipeline 60 psig and under are in the local operating centers.</i>		
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Satisfactory
General Comment: <i>The operator was able to provide records from the Subject Matter Reference Meetings that were conducted throughout 2013.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Yes
General Comment: <i>The operator was able to show that the OQ plan review is part of the Subject Matter Reference Meetings.</i>		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
General Comment: <i>The laptops in each truck contain the records, maps and operating history.</i>		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Satisfactory
General Comment: <i>The operator was able to provide documentation demonstrating that the QA reporting process addresses deficiencies in the effectiveness of the normal O&M procedures.</i> <i>Staff reviewed 2013 Quality Assurance Results.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual	Satisfactory

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	operating and maintenance conditions?	
General Comment: <i>The operator was able to provide documentation of surveillance records taking into account class location changes, failures, leak history, corrosion, etc. as well as corrective actions taken.</i>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
General Comment: <i>The operator does not have any cast iron pipe within the gas system.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
General Comment: <i>The operator does not have any cast iron pipe within the gas system.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
General Comment: <i>The operator does not have any caulked bell and spigot joints within the gas system.</i>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
General Comment: <i>The operator does not have any caulked bell and spigot joints within the gas system.</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
Refer to operator Qualification Inspection Forms and Protocols		Yes
General Comment: <i>Staff completed PHMSA Form 14 related to the operator's OQ plan.</i>		
DAMAGE PREVENTION RECORDS		Status
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Satisfactory
General Comment: <i>The operator was able to provide supporting documentation for JULIE tickets, Damaged Services, Damaged Mains and Damages per 1000 locates.</i>		

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Has the number of damages increased or decreased from prior year?		Decreased
<u>General Comment:</u> 2010 - 3.90 Total Gas Damages/1000 Locates 2011 - 3.35 Total Gas Damages/1000 Locates 2012 - 3.28 Total Gas Damages/1000 Locates 2013 - 2.88 Total Gas Damages/1000 Locates		
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Satisfactory
<u>General Comment:</u> The operator tracks records of all accidents, identifies the cause and works with excavators to prevent future damages to the gas system.		
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Satisfactory
<u>General Comment:</u> Ameren is a member of JULIE. All tickets are sent to the operator. A positive response is sent back to the excavator.		
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Yes
<u>General Comment:</u> The operator hired 4 new Damage Prevention Specialists (now a total of 7 in the Ameren territory). A monthly meeting takes place with the 2 locating companies as well to review turn-around times.		
Do pipeline operators include performance measures in facility locating contracts?		Yes
<u>General Comment:</u> 98% of tickets must be worked within 24 hours of initial contact, per contract, and the turnaround for emergencies is 2 hours.		
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Satisfactory
<u>General Comment:</u> The operator was able to demonstrate that excavations resulting in a release of gas were reported to ICC JULIE Enforcement.		
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Yes
<u>General Comment:</u> The operator is a CGA member and includes Common Ground Alliance best practices in the locator contracts.		
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Applicable
<u>General Comment:</u> The operator is a CGA member and includes Common Ground Alliance best practices in the locator contracts.		
EMERGENCY PLANS		Status

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[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>EMER 2.04 of the operator's O&M contains the emergency plan.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
<u>General Comment:</u> <i>The operator conducts an interactive mock emergency training session.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Satisfactory
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Satisfactory
<u>General Comment:</u> <i>The operator was able to provide documentation of all liaison meetings for 2013, including sign in sheets showing the department represented and person(s) attending the meeting.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Satisfactory
<u>General Comment:</u> <i>56 total 27 within the hour had no-one respond at all. 29 of the 56 had non-qualified personnel as first responders.</i>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status
Refer to Public Awareness Program Inspection Forms and Protocols		Yes
<u>General Comment:</u> <i>The Public Awareness Plan was reviewed during this audit. See Inspection Documents.</i>		
ODORIZATION OF GAS		Status
<u>Category Comment:</u> <i>Odorization records are housed at the local Operation Centers.</i>		
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Not Checked
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Not Checked

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[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Not Checked
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Not Checked
PATROLLING & LEAKAGE SURVEY		Status
<u>Category Comment:</u> <i>Patrolling and Leakage Survey records are housed at the local Operation Centers.</i>		
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Not Checked
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Not Checked
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Not Checked
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Not Checked
YARD LINES - RESIDENTIAL		Status
<u>Category Comment:</u> <i>Yard Line records are housed at the local Operation Centers.</i>		
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Not Checked
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Not Checked
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Not Checked
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
<u>Category Comment:</u> <i>Abandonment or Deactivation records are housed at the local Operation Centers.</i>		
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Not Checked

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[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Checked
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Not Checked
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Not Checked
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Checked
PRESSURE LIMITING AND REGULATION		Status
<u>Category Comment:</u> Pressure Limiting and Regulation records are housed at the local Operation Centers.		
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Not Checked
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Not Checked
[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Not Checked
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	Not Checked
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Not Checked
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Not Checked
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Checked
VALVE MAINTENANCE		Status
<u>Category Comment:</u>		

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<i>Valve Maintenance records are housed at the local Operation Centers.</i>		
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Not Checked
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Checked
Investigation Of Failures		Status
[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Satisfactory
<u>General Comment:</u> <i>The operator was able to provide documentation of all failures required to be analyzed for 2013.</i>		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Satisfactory
<u>General Comment:</u> <i>The operator's welding procedures are included in the O&M.</i>		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification documentation as required?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed documentation of welder qualification/re-qualification.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
<u>General Comment:</u> <i>The NDT records were reviewed at a previous audit at Decatur Plaza.</i>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
<u>General Comment:</u> <i>The NDT records were reviewed at a previous audit at Decatur Plaza.</i>		
JOINING OF MATERIAL OTHER THAN WELDING		Status
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Satisfactory
<u>General Comment:</u> <i>The operator was able to provide documentation of qualification for persons making plastic joints.</i>		
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Satisfactory
<u>General Comment:</u>		

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<i>The operator was able to provide documentation of qualification for persons inspecting plastic joints.</i>		
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Satisfactory
<u>General Comment:</u> <i>The joining procedures are located in section "POLY - Polyethylene Pipe" of the operator's O&M.</i>		
CORROSION CONTROL RECORDS		Status
<u>Category Comment:</u> <i>Corrosion Control records are housed at the local Operation Centers.</i>		
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	Not Checked
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Not Checked
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Not Checked
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Not Checked
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Checked
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Checked
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Not Checked
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Not Checked
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Not Checked
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Checked
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not	Not Checked

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	affecting adjacent underground metallic structures?	
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Checked
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Not Checked
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Checked
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Not Checked
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Not Checked
[192.491][192.483(a), 192.483(b), 192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Not Checked
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<u>General Comment:</u> O&M reviews to correspond with 2 updates to the O&M (Jan and April) Apprenticeship program. Mock emergency scenarios Leak investigation review 6 week program for new welders		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Satisfactory
<u>General Comment:</u> The operator has a 27-36 month Apprenticeship program, depending upon the legacy company.		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Not Applicable
<u>General Comment:</u> Ameren Illinois is not a municipal operator.		
[520.10(a)(5)]	Are procedures periodically updated to include new	Satisfactory

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	materials, new methods of operation and installation, and changes in general procedures?	
<u>General Comment:</u> <i>The operator releases periodic "Action Matters" newsletters as a reminder for correct O&M procedures or to address issues that have arisen in the field.</i>		

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